

## **REMARKS**

Reconsideration of this application is respectfully requested. Claims 5 and 14 are hereby amended.

### **35 U.S.C. § 112 Rejection**

The Examiner rejected claim 5 for lack of antecedent basis. As amended, claim 5 is now dependent upon claim 3, which provides the proper antecedent basis. Accordingly, it is respectfully requested that the rejection under § 112 be withdrawn.

### **35 U.S.C. § 102 Rejection**

The Examiner rejected claims 1, 6-7, 14, and 16-19 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,764,804 to Yajima et al. ("Yajima").

Claims 1 and 14, as amended, are not anticipated by Yajima. Independent claim 1 refers to receiving an encoded video file that includes a plurality of encoded video data tables **AND** a plurality of reference pixel value sets. Similarly, independent claim 14 refers to receiving, from an encoder, an encoded pixel **AND** a reference pixel value set. Accordingly, in both claims, the reference pixel value sets are received from the encoder as separate information. That is, the reference pixel value sets are received by the decoder in addition to the encoded video data tables, according to claim 1, and in addition to the encoded pixel, according to claim 14. As such, the reference pixel value sets are used to decode the encoded video data tables, according to claim 1, and the encoded pixel, according to claim 14.

Yajima relates to a data encoding/decoding system for which reference pixels are used to encode a pixel, thereby resulting in an encoded pixel. Similarly, reference pixels are used to decode the encoded pixel. However, the manner in which reference pixels are selected (or generated) and used in Yajima is entirely different from Applicant's invention as claimed. To begin, with Yajima the reference pixels are not communicated from the encoder to the decoder, and therefore, in contrast to claims 1 and 14, the system of Yajima does not disclose or suggest receiving a plurality of pixel value sets. Instead, according to Yajima the line buffer at the decoder generates the reference pixels. See Col. 18, line 36 through Col. 19, line 25. The reference pixels are generated based on their relative position to the pixel being encoded or

decoded. Therefore, the decoder does not receive reference pixels, but instead, the decoder generates reference pixels. Moreover, with Yajima the values of the reference pixels represent a state (e.g., a vertical axis) in a pre-calculated look-up table that is used to code/decode the pixels. Consequently, claims 1 and 14, as amended, are not anticipated by Yajima. As claims 6-7 and 16-19 are dependent upon claims 1 and 14 respectively, for the reason stated above these claims are not anticipated by Yajima .

For the same reasons, dependent claims 6 and 18 are not anticipated by Yajima. Moreover, dependent claims 6 and 18 refer to reference pixel value sets that include a red reference pixel value set, a blue reference pixel value set, a green reference pixel value set, and a black reference pixel value set. Accordingly, as indicated in claims 6 and 18, reference pixel values are selected based on color attributes and not a pixel's position relative to the position of the pixel being decoded. In contrast, the decoding system of Yajima generates reference pixels for encoding/decoding a pixel, based on a pixel's position relative to the pixel being encoded/decoded. Consequently, Yajima does not anticipate dependent claims 6 and 18.

For the same reasons that independent claims 1 and 14 are not anticipated by Yajima, dependent claims 7 and 19 are also not anticipated by Yajima. Furthermore, claims 7 and 19 refer to a reference pixel value set that includes a reference color value set, a reference chrominance value, and a reference luminance value. Yajima does not describe or suggest the use of a reference chrominance value or a reference luminance value, as part of a reference pixel value set. According to Yajima, reference pixels are those pixels located in a particular position relative to a pixel being encoded or decoded. The reference pixels represent a particular state, which is used to determine an encoded/decoded pixel value. However, the reference pixels described in Yajima are not broken down into color components, as is claimed. Consequently, dependent claims 7 and 19 are not anticipated by Yajima.

### **35 U.S.C. § 103(a) Rejection**

The Examiner rejected claims 2-5, 8, 10-11, 15 and 21-22 under 35 U.S.C. § 103(a) as being obvious in view of the combination of Yajima and U.S. Patent Number 4,730,214 to Lambert et al. ("Lambert").

The Examiner does not rely upon Lambert for teaching any of those features of claims 1 and 14 which, as described above, are not disclosed or suggested by Yajima. Consequently, the

dependent claims 2-5, 8, 10-11, 15 and 21-22 are not obvious in view of the combination of Yajima and Lambert for the same reasons that Yajima does not anticipate claims 1 and 14. Stated differently, neither Yajima nor Lambert, when considered singularly or in combination, disclose or suggest receiving, at a decoder, encoded video data tables and a plurality of reference pixel value sets.

Furthermore, Lambert is relied upon for teaching dominant color values. However, Lambert refers to intensity values which are not the same as dominant color values, as that term is used in Applicant's specification. Consequently, the combination of Yajima and Lambert does not render Applicant's claims obvious.

If there are any additional fees due in connection with this communication, including fees for any extensions of time, please charge Deposit Account No. 19-3140.

Respectfully submitted,  
SONNENSCHN NATH & ROSENTHAL LLP

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/Nathan P. Elder/

Nathan P. Elder  
Reg. No. 55,150

PO Box 061080  
Wacker Drive Station, Sears Tower  
Chicago, IL 60606-1080  
650-798-0370